

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
)
Plaintiff,)
) 23 CR 54-3
)
v.))
)
DAVID R. LIRA)
)
Defendant)

UNOPPOSED MOTION FOR THE RETURN OF
DEFENDANT'S PASSPORT

The Defendant, DAVID LIRA by and through his attorneys, Cheronis & Parente, respectfully requests an order authorizing the Northern District of Illinois Pre-Trial Services to return Mr. Lira's passports. In support thereof, Mr. Lira states the following.

1. Mr. Lira was charged under the above indictment number. As a condition of pre-trial release, Mr. Lira tendered his passports to the Pre-Trial Services office.
2. Mr. Lira tendered his valid United States Passport to Pre-Trial Services
3. Mr. Lira was sentenced by this Court on October 6, 2025, to a term of 4 months in the Bureau of Prisons and 4 months in home confinement.
4. Mr. Lira now asks the Court to enter an order directing Pre-Trial services to return his passports to counsel.
5. In counsel's experience, passports get destroyed quickly if not returned.
6. Counsel will hold Mr. Lira's passports in his possession until Mr. Lira has served his sentence.

7. Counsel has contacted the government and can represent that the government has no objection to this request.

WHEREFORE, the Defendant, DAVID LIRA, respectfully requests that this Honorable Court issue an order authorizing the Northern District of Illinois Pre-Trial services to return Mr. Lira's passports.

Respectfully submitted,

/s/ Damon M. Cheronis
Damon M. Cheronis

Cheronis & Parente
140 S. Dearborn Street Suite 404
Chicago, IL 60603
(312) 663-4644
damon@cheronislaw.com

CERTIFICATE OF SERVICE

I, Damon M. Cheronis, hereby certify that on [date of filing], I electronically filed the foregoing **Unopposed Motion for the Return of Defendant's Passports** with the Clerk of the U.S. District Court for the Northern District of Illinois, Eastern Division, by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

/s/ Damon M. Cheronis

Damon M. Cheronis
Cheronis & Parente
140 S. Dearborn Street, Suite 404
Chicago, Illinois 60603
(312) 663-4644
damon@cheronislaw.com